

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION

FILED IN OPEN COURT  
ON 8/20/14 ML  
Julie A. Richards, Clerk  
US District Court  
Eastern District of NC

CASE NO. 4:14-MJ-1017

UNITED STATES OF AMERICA )

v. )

Monique Tan )

DEFENDANT'S  
MOTION TO CONTINUE  
(18 USC § 3161(h)(8))

Pursuant to 18 USC § 3161(h)(7) and to Local Rule 4.11, the Defendant respectfully requests that the above-captioned case be continued from the present docket. In support of this motion, the Defendant sets forth the following:

1. Kelly Greene & Tom Wilson, attys, plea negotiations ongoing
2. This is the 2nd continuance filed by the Defendant in the present case. The Special Assistant United States Attorney does / does not object to this motion.
3. I understand that if this motion is granted, I must next appear in court at 9:00 a.m. on the 15 Oct. 2014 Court docket, and that failure to appear may result in the issuance of an arrest warrant.

Submitted on: August 20, 201<sup>4</sup>.

[Signature]  
Defendant or Attorney for Defendant

The Court finds that the ends of justice served by the granting of such a continuance outweigh the best interest of the public in a speedy trial for the following reasons:

- ☐ Failure to do would likely result in a **miscarriage of justice**.
- ☐ The **usual nature or complexity of the case** makes it unreasonable to expect the Defendant to adequately prepare for pretrial proceedings or trial with the time limits set forth in 18 USC 3161.
- ☐ Failure to do so would deny the Defendant reasonable **time to obtain counsel**;
- ☐ Failure to do so would unreasonably deny the Defendant **continuity of counsel**;
- ☒ Failure to do so would deny the Defendant the reasonable **time necessary for effective preparation**, taking into account the exercise of due diligence.

Accordingly the continuance is ALLOWED. The intervening time from 8/20/2014 to 10/15/2014 Is excluded from speedy trial computation under 18 USC 3161.

August 20, 2014  
Date

[Signature]  
United States Magistrate Judge